

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Civil Action No. 2:16-cv-_____
v.)	
)	
SANDRA T. GRIFFIN)	
2704 Nestlebrook Trail)	
Virginia Beach, VA 23456,)	
)	
Defendant.)	
_____)	

COMPLAINT FOR FEDERAL TAXES

The United States of America brings this action at the request of the Chief Counsel of the Internal Revenue Service, a delegate of the Secretary of the Treasury, and at the direction of the Attorney General of the United States to reduce to judgment assessments made against Sandra T. Griffin for unpaid federal income tax liabilities.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this civil action pursuant to 28 U.S.C. §§ 1340 and 1345, and 26 U.S.C. § 7402(a).
2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391 and 1396.

PARTIES

3. Plaintiff is the United States of America.
4. Defendant Sandra T. Griffin is a resident of Virginia Beach, Virginia.

REDUCE TAX ASSESSMENTS TO JUDGMENT

5. The United States incorporates paragraphs 1 through 4 of this Complaint as if fully set forth herein.

6. A delegate of the Secretary of the Treasury has made assessments against Sandra T. Griffin for federal income tax liabilities as follows:

Tax Type	Tax Period Ending	Date of Earliest Assessment	Amount of Earliest Assessment	Outstanding Balance¹ (as of October 11, 2016)
1040	12/31/2001	10/09/2006	\$10,296.00	\$2,516.14
1040	12/31/2002	10/09/2006	\$34,847.00	\$93,845.35
1040	12/31/2003	06/27/2011	\$26,695.00	\$63,417.06
1040	12/31/2004	10/03/2011	\$13,156.00	\$31,125.26
1040	12/31/2005	10/03/2011	\$47,561.00	\$108,509.64
1040	12/31/2006	04/28/2014	\$176,731.00	\$382,699.94
1040	12/31/2007	06/25/2012	\$70,535.27	\$92,288.37
1040	12/31/2009	06/09/2014	\$69,529.83	\$77,781.51
1040	12/31/2010	05/25/2015	\$35,316.00	\$31,455.43
Total				\$883,638.70

7. A delegate of the Secretary of the Treasury gave Defendant notice and demand for payment of the assessments described in paragraph 6.

8. Statutory additions to tax have accrued and will continue to accrue on the unpaid balance of the assessments set forth in paragraph 6.

¹Includes statutory interest and penalties that have accrued, and which continue to accrue, on the remaining unpaid taxes.

9. Defendant has failed to pay the United States the full amount owed as a result of the tax assessments described in paragraph 6.

10. On account of the assessments described in paragraph 6, Defendant is indebted to the United States in the amount of \$883,638.70 as of October 11, 2016, plus statutory additions that will continue to accrue thereafter until paid.

WHEREFORE, the United States prays that the Court:

A. Render judgment in favor of the United States and against Sandra T. Griffin for unpaid federal income tax liabilities in the amount of \$883,638.70 as of October 11, 2016, plus statutory additions that will continue to accrue thereafter until paid; and

B. Award the United States such further relief that the Court deems appropriate, including the costs of this action.

Dated this 5th day of October 2016.

Respectfully submitted,

UNITED STATES OF AMERICA
Plaintiff

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/s/
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